

**INSPECTION ADMINISTRATIVE PROCEDURE**

**A-108**

**INSPECTION FOLLOW-UP SYSTEM**

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Revision 5

Approved: Patrick Carier  
Verification and Confirmation Official

Date: 4/3/03

Concur: Robert C. Barr

Date: 4/8/03

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# **INSPECTION ADMINISTRATIVE PROCEDURE A-108, REV. 5**

## **INSPECTION FOLLOW-UP SYSTEM**

### **1.0 PURPOSE**

This procedure establishes the objectives, responsibilities, requirements, and procedures for the use and maintenance of the Consolidated Action Reporting System (CARS) as it pertains to tracking follow-up items.

### **2.0 BACKGROUND**

The CARS is an Office of River Protection (ORP) system for tracking and managing the follow-up through completion of WTP Safety Regulation Division (OSR) items identified during OSR inspections and items identified from Contractor-initiated Occurrence Reports and other OSR-related information sources.

### **3.0 POLICY AND OBJECTIVES**

- 3.1 All Findings and assessment follow-up items will be tracked in the CARS.
- 3.2 The data entered into the CARS will be verified accurate by the originator of the item prior to submittal to the Verification and Confirmation Official (VCO). The VCO signature allows entry to the CARS.
- 3.3 CARS reports will be generated upon request.

### **4.0 DEFINITIONS**

Authorization Basis. The composite of information provided by the Contractor in response to radiological, nuclear, and process safety requirements that are the bases on which the ORP grants permission to perform regulated activities. The following are specific documents (including material incorporated by reference) that help to form the Authorization Basis:

- Safety Requirements Document (SRD), Volume II, 24590-WTP-SRD-ESH-01-001-02
- Integrated Safety Management Plan (ISMP), 24590-WTP-ISMP-ESH-01-001
- Preliminary Safety Analysis Report to Support Construction Authorization, General Information, 24590-WTP-PSAR-ESH-01-002-01
- Preliminary Safety Analysis Report to Support Construction Authorization, PT Facility

Specific Information, 24590-WTP-PSAR-ESH-01-002-02

- Preliminary Safety Analysis Report to Support Construction Authorization, LAW Facility Specific Information, 24590-WTP-PSAR-ESH-01-002-03
- Preliminary Safety Analysis Report to Support Construction Authorization, HLW Facility Specific Information, 24590-WTP-PSAR-ESH-01-002-04
- Preliminary Safety Analysis Report to Support Construction Authorization, Balance of Facility Specific Information, 24590-WTP-PSAR-ESH-01-002-05
- Revision to the BOF PSAR Adding Facilities/Systems to the Construction Authorization Request, 24590-WTP-ABCN-ESH-02-014
- Quality Assurance Manual (QAM), 24590-WTP-aQAM-QA-01-001
- Radiation Protection Program for Design and Construction (RPP), 24590-WTP-RPP-ESH-01-001
- The information submitted in connection with a request for Standards Approval, a request for Construction Authorization, a request for Commissioning Authorization, or an Initial Safety Assessment. This includes the information associated with the requests as described in DOE/RL-96-0003, *DOE Regulatory Process for Radiological, Nuclear, and Process Safety for the River Protection Project Waste Treatment Plant Contractor*, and any other information submitted by the Contractor in connection with the requests.
- Amendments to the information described above that are on the Contractor's docket. Such amendments may be in the form of revisions to previously submitted documents, or new information that supplements previously submitted information.

The authorization basis begins at the Standards Approval regulatory action and continues throughout the design, construction, operations, and decommissioning of the River Protection Project Waste Treatment and Immobilization Plant (WTP) Contractor facility.

Open item: A generic name for items or issues OSR has identified for further investigation and follow-up. Open items are further identified as Findings, Assessment Follow-Up Items, and Other Follow-up Items.

Finding. An inconsistency with a commitment in the authorization basis or an item that is not in compliance with a requirement in the SRD or applicable regulations.

Assessment/Inspection Follow-up Item: A matter that requires further inspection because of a potential problem, because specific Contractor or OSR action is pending, or because additional information is needed that was not available at the time of the inspection.

Occurrence Report: A report, generated by the Contractor describing an event or conditions, that meets the Contractor's reporting threshold.

Other Follow-up Item: An item requiring inspection follow-up that was identified outside of the inspection process, such as a Contractor commitment made to the OSR via official correspondence that OSR management chooses to track and verify through future inspection follow-up.

## **5.0 GENERAL REQUIREMENTS**

### **5.1 DATA INTEGRITY**

OSR personnel responsible for providing input (generally the lead inspector for an inspection report or the originator of an Other Follow-up Item, for follow-up items) to the CARS are responsible for ensuring the completeness and accuracy of the data. The verification of accuracy is indicated by the author's signature on the data entry form (provided as Attachment 1). OSR staff should ensure timely closure of open items; except in extenuating circumstances, they should not remain open more than one year. The author of the data entry form should discuss with the VCO a plan for follow-up and closure of the Item and enter the closure plan on the form. Closure is normally documented in an inspection report and documents the verification of completion of action necessary to close the item.

### **5.2 DATA INPUT**

The CARS data entry form (see Attachment 1) documents each follow-up item. Input, updates, and corrections may be made by completing and signing a CARS data entry form, and obtaining the signature of the VCO.

### **5.3 OPEN ITEM NUMBERING SYSTEM**

The system for numbering open items shall be as follows:

- 5.3.1 The number for open items identified in an inspection report will consist of the complete inspection report number followed by a single-digit identifier (F for finding and A for assessment follow-up item) and a two-digit sequence number for the particular type of item. For example, the second finding identified in an inspection would be numbered—inspection report number-F02.
- 5.3.2 AFIs that are later determined to be Findings will be given a new number based on the current inspection report. The old item will be closed in the inspection report. For historical purposes, the new open item number will be entered in the comment section of the original open item.

- 5.3.3 The number for follow-up items will be derived from the occurrence report number assigned by the Contractor. For example, the first occurrence report for Calendar Year 2003 would be RP-BNRP-RPPWTP-2003-0001. Other sources for follow-up items will be assigned a tracking number which consists of a two-digit number representing the year followed by a three-digit number assigned by the tracking system coordinator, followed by the single-digit identifier (O for other). For example, the first follow-up item assigned from sources other than inspections or occurrence reports in calendar year 2003 would be 03-001-O.

## **5.4 TEXT ENTRY**

The following data should be entered, as appropriate, for each item:

- **NUMBER:** the Open Item number (see Section 5.3)
- **DATE OPENED:** the date the inspection report was issued or the date the item was identified if not from an inspection report
- **ASSIGNED INSPECTOR:** the name of the individual responsible for follow-up of the item (if known)
- **TITLE:** brief title description of the item (described in 50 characters or less)
- **DETAILED DESCRIPTION:** detailed description of the item
- **OSR CLOSURE PLAN:** OSR plans for closure of the item (provide information as discussed with the VCO, regarding when the item is scheduled for review for closure; e. g., "during the next Design Process inspection Scheduled for December 2002").
- **CONTRACTOR ACTION REQUIRED:** Contractor actions, if any, required before the item can be closed
- **COMMENTS:** comments, if any, concerning the item. Information such as response letter number and date, and date corrective actions are expected to be complete should be added when/if available
- **INTERIM INSPECTIONS:** a running list of any inspection report numbers where interim inspections of the item were performed and discussed
- **CLOSEOUT DATE:** the date the item was closed (inspection report issue date if applicable)
- **CLOSEOUT REPORT NUMBER:** the inspection report number that documented closeout of the item (if any).

## **5.5 INSPECTION TRACKING REPORTS**

5.5.1 Open item tracking reports will be prepared upon request to enable the OSR to effectively manage the inspection program, gauge the Contractor's responsiveness to inspection Findings and follow-up items, gauge the OSR's performance in processing inspection Findings and follow-up items, determine the need to make adjustments in the implementation of the inspection program, and raise performance issues with the Contractor.

5.5.2 Elements in tracking reports will include, but not necessarily be limited to:

- Open item tracking number
- Detailed description of item
- Contractor actions
- OSR closure plan

## **5.6 SECURITY CONSIDERATIONS**

5.6.1 Access to the CARS shall be controlled to ensure entry and update capabilities are restricted to authorized personnel.

5.6.2 Proprietary data, security information, and other sensitive or sensitive unclassified information should be excluded from the IFS database. Reference to an allegation or an alleged is prohibited.

Attachment: Assessment Follow-up System Data Entry Form

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**Attachment 1. Assessment Follow-up System Data Entry Form**

**ASSESSMENT FOLLOW-UP SYSTEM  
DATA ENTRY FORM**

FOLLOW-UP ITEM TRACKING NUMBER: \_\_\_\_\_ DATE OPENED: \_\_\_\_\_ DATE UPDATED: \_\_\_\_\_

ASSIGNED INSPECTOR: \_\_\_\_\_

TITLE DESCRIPTION (50 CHARACTERS OR LESS): \_\_\_\_\_  
-----

DETAILED DESCRIPTION:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

OSR CLOSURE PLAN:

\_\_\_\_\_  
\_\_\_\_\_

CONTRACTOR ACTION REQUIRED:

\_\_\_\_\_  
\_\_\_\_\_

COMMENTS:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

INTERIM INSPECTIONS (REPORT NUMBERS): \_\_\_\_\_

CLOSEOUT DATE: \_\_\_\_\_ CLOSEOUT REPORT NUMBER: \_\_\_\_\_

ORIGINATOR SIGNATURE: \_\_\_\_\_ VCO SIGNATURE: \_\_\_\_\_

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